

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>
<b>THIS DOCUMENT RELATES TO:</b>  <b>Ethicon Wave 4 cases listed in Exhibit A</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**PLAINTIFFS' MOTION TO EXCLUDE CERTAIN OPINIONS  
AND TESTIMONY OF MICHAEL FIEGEN, M.D.**

Plaintiffs respectfully request that the Court preclude defense expert Michael Fiegen, M.D., from giving opinions on (1) the adequacy of the subject product warnings and instructions for use ("IFU"), (2) the safety and efficacy of the subject products based on his own clinical practice; and (3) the design or safety of the subject transvaginal mesh products. The basis for Plaintiffs' motion is more fully set out in the accompanying Memorandum.

Dated: April 13, 2017

Respectfully submitted,

/s/ Thomas P. Cartmell

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*Attorneys for Plaintiff*

### **CERTIFICATE OF SERVICE**

I hereby certify that I filed the foregoing document on April 13, 2017, using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/Thomas P. Cartmell

**Attorney for Plaintiffs**

## **INDEX OF EXHIBITS**

**Exhibit A:** List of cases on which Dr. Fiegen is designated

**Exhibit B:** Fiegen Expert Report

**Exhibit D:** Fiegen Deposition March 17, 2016